

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Cr. No. 05-40035-FDS
)	
RICHARD BOTCHWAY,)	
)	
Defendant.)	

**GOVERNMENT'S MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO
MOTION TO SUPPRESS**

The United States of America, by Assistant U.S. Attorney David Hennessy, respectfully moves this Court for an extension of time in which to respond to a motion to suppress evidence and statements in the above-captioned case to April 10, 2006.

In support of this motion, the government states as follows:

1. Because all mail to the Worcester Office must be screened in Boston, Defendant's motion, dated March 14, 2006, was not received in Worcester until March 20, 2006.

2. Counsel for the government is newly-assigned to this case; it was originally prosecuted by John Hodgins who has left the U.S. Attorney's Office.

3. In the wake of Mr. Hodgins' departure, Counsel for the government is dealing with a number of newly-assigned matters and administrative tasks.

4. The government has not previously sought an enlargement of time by which to respond.

5. Counsel for defendant Botchway, Mr. Halpern, has no

objection to an enlargement of time to April 10, 2006.

WHEREFORE, the government respectfully moves for an enlargement of time to April 10, 2006, by which to respond to the motion to suppress.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ David Hennessy
David Hennessy
Assistant U.S. Attorney

Date: March 29, 2006

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Keith Halpern
4 Longfellow Place
37th Floor
Boston, Massachusetts 02114-2838

This 29th day of March, 2006.

/s/ David Hennessy
David Hennessy
Assistant U.S. Attorney